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               IN THE UNITED STATES DISTRICT COURT
               FOR THE NORTHERN DISTRICT OF OHIO
2
                        EASTERN DIVISION
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    IN RE: NATIONAL PRESCRIPTION ) No. 17-md-2804
    OPIATE LITIGATION NO. 2804
                                     )
   APPLIES TO ALL CASES
                               ) Hon. Dan A. Polster
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                                      )
6
          HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
8
                     CONFIDENTIALITY REVIEW
9
                VIDEO DEPOSITION OF CHRIS DYMON
10
                        January 25, 2019
11
                            9:09 a.m.
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                Reporter: Jude Arndt, CSR, RPR
                       CSR No. 084-004847
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Case: 1:17-md-02804-DAP Highly Confident	Doc #: 1976-21 Filed:	07/24/19 2 of 343. PageID #: 2 Further Confidentiality	21370 Review
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Case: 1:17-md-02804-DAP Doc #: 1	1 <mark>976-21 Filed: 07/24/1</mark> Subject to Furth	9 <mark>3 of 343. PageID #: 221</mark> er Confidentiality	<mark>371</mark> Review
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- 1 when you went for your yearly assessment in 2013,
- 2 this -- whatever with work you did to support the top
- 3 100, top 500 indexing system was one of your
- 4 achievements that you helped with in 2013; correct?
- 5 A. Correct, I assisted on it, yes.
- 6 Q. And it was an important part of the
- 7 overall let's try to make the RX Integrity program more
- 8 robust; fair statement?
- 9 MS. DESH: Objection. Vaque.
- 10 A. To learn more, again. It's just all about
- 11 learning and learning what could we do.
- 12 Q. (By Mr. Shkolnik) And if we could turn to
- the next page. Bates numbered 264. In 264 we have a
- 14 breakdown of the various phases of the SOM substance
- order logic for the program that was implemented prior
- to you beginning with the group in 2013.
- Have you ever seen any diagram similar to
- 18 this that outlined the phases of the SOM system -- the
- 19 CSOM system?
- A. I may have, but I really can't recall.
- Q. According to Phase 1, which according to
- 22 this was implemented 2009 to 2010 -- I'm sorry, August
- of 2009 through September of 2010, the first phase of
- the CSOM process would be it would review all

- 1 controlled Walgreens DC orders, and it would flag
- orders -- and it says up on top, am I correct, flag
- 3 select orders as suspicious? That's what the algorithm
- 4 is saying, the logic; correct?
- 5 A. According to the information on this
- 6 slide.
- 7 Q. And in fact, it says that this was
- 8 actually prepared for litigation at the bottom,
- 9 anticipation of litigation or at the direction of
- 10 litigation and regulatory law. This was in preparation
- 11 for the trial where they were going to -- where DEA was
- 12 coming after Walgreens; correct?
- 13 A. I do not --
- MS. DESH: Objection. Calls for
- 15 speculation.
- 16 A. I do not know.
- 17 Q. (By Mr. Shkolnik) You knew that they were
- 18 going -- that they were about to go to trial with the
- 19 DEA when you started with Integrity; correct?
- MS. DESH: Same objection.
- Q. (By Mr. Shkolnik) In February of that
- 22 year?
- A. I know we were in contact with the DEA. I
- don't know if it ever went to a trial or anything like

- 1 that.
- Q. Well, it didn't go to trial; you guys
- 3 settled. But you were aware that the team was gearing
- 4 up for trial against the DEA over its suspicious order
- 5 monitoring program? Were you aware of that?
- MS. DESH: Same objection.
- 7 A. Again, I don't know if our legal team was
- 8 preparing for trial or not. I don't know.
- 9 Q. (By Mr. Shkolnik) It would be a nice
- 10 exhibit if they were going to trial, but that's a whole
- 11 'nother issue.
- 12 And it says that the -- it flags select
- orders as suspicious, based on a 26-week pattern, and
- 14 then the key point on what was done in that first year,
- 15 August of 2009 to September of 2010, orders were not
- 16 reduced if they were flagged as suspicious. That's
- what they're telling us; correct?
- 18 A. According to the information on the slide,
- 19 yes.
- Q. Did anyone ever tell you that there was a
- one-year period where this new SOM logic was being
- implemented where they were flagging orders as
- 23 suspicious, were shipping them, and were not reducing
- 24 them? Did anyone ever tell you that?

- 1 A. Not that I can recall.
- Q. From your understanding, would it be
- 3 appropriate if whatever the system in place was -- I'm
- 4 not going to identify what logic it was or what
- 5 algorithm. Was it your understanding that if the
- 6 company flagged an order as suspicious, they were not
- 7 supposed to order it -- I'm sorry, ship it?
- MS. DESH: Objection to the form.
- 9 A. Again, looking at regs, potentially they
- 10 may have not been able to ship it.
- 11 Q. (By Mr. Shkolnik) So in the first year of
- this new algorithm or program, they were flagging, and
- they were not reducing, and they were shipping.
- So in the second phase, let's start from
- 15 September 2010, and it says to current -- given the
- 16 dates in this, some time in 2012 -- it says the orders
- were reviewed, they were flags based on drug by store,
- 18 historical patterns of 26 weeks, but they had
- implemented in this Phase 2 that they would be reducing
- 20 only WAG DC orders.
- 21 So this would be saying they had a
- reduction in place if it exceeded -- if it was found to
- 23 be suspicious, and if a WAG order -- that means a
- 24 Walgreens DC order -- would be reduced and shipped;

- 1 correct?
- 2 A. Looks so, according to this document, yes.
- Q. So then at this point they were saying
- 4 Phase 3, it was estimated to be implemented some time
- 5 in mid-2012, that it would check to see if an order was
- 6 placed with a vendor after -- 48 hours after it was
- 7 flagged.
- 8 So here it's saying it was flagged based
- 9 on drug by store, historical pattern over 26 weeks. So
- 10 that stayed the same; correct?
- 11 A. I don't know. I wasn't working on this at
- 12 the time.
- Q. But if we're just reading it, that's what
- 14 it says? It's basically the same as the top two?
- 15 A. Based on this document, yes.
- 16 Q. And there was a discussion during that
- time frame to shorten the analysis period down to 13
- 18 weeks. Irrespective of the wording of discussion, when
- 19 you got involved in the RX Integrity, would I be
- 20 correct that it was down to 13 weeks, the algorithm, or
- 21 was it still 26 weeks?
- A. I believe it was 13 or possibly even lower
- 23 at the time. I can't exactly recall.
- Q. What would be the significance of

- 1 shortening the period that the algorithm applies? How
- 2 does that affect your -- the analysis in terms of
- 3 observing changes and patterns?
- 4 A. Again, I didn't design the algorithm. I
- 5 would imagine it probably makes it easier to analyze a
- 6 succinct piece of time easier.
- 7 Q. Or it's harder to see a change if you're
- 8 looking at a shorter period than you're looking at a
- 9 longer period; isn't that also a possibility?
- 10 A. I do not know. I'm not a statistician.
- 11 Q. So here it's -- then it goes on to say
- what are the takeaways of it after it's been flagged as
- 13 suspicious? Review and refinements of tolerance and
- 14 frequency threshold, confirmed action for each possible
- 15 scenario using a matrix.
- Now, then it goes on to say the Phase 4,
- 17 which was going to be implemented sometime in 2012 --
- 18 and basically it was saying that the algorithm for
- 19 suspicious order monitoring would include both DC
- orders, WAG DC orders, and vendor orders, and flag any
- 21 as suspicious if they exceed the threshold.
- When you came into SOM, was that procedure
- 23 in place?
- A. I believe it was. It's hard to recall

- 1 exactly what changes were occurring, but I believe they
- were already starting that.
- Q. Yeah, that was not a -- that was not a
- 4 change implemented by the new team; that was already in
- 5 the works before you guys -- you came in, wasn't it?
- A. It probably was in the works, yes.
- 7 Q. And here it was saying both WAG DC,
- 8 Walgreens distribution center, as well as the vendor
- 9 orders were all reduced if they exceeded a threshold,
- 10 and when you got on board, that was a process that was
- 11 occurring in 2013; correct?
- 12 A. From what I recall, yes.
- Q. When you joined the team, when an order
- 14 had been reduced, either a WAG or vendor order, was a
- report being made to the DEA?
- 16 A. Yes.
- 17 Q. As soon as it was reduced?
- 18 A. The same day when I was on the team, yes.
- 19 Q. So once a reduction occurs, the daily
- 20 report would say an order came in, we reduced it, and
- 21 DEA, you're on notice of this?
- MS. DESH: Objection to the form.
- 23 A. Same as the templates we looked at
- 24 earlier.

- 1 Q. (By Mr. Shkolnik) Would they -- would it
- 2 be automatic, or would someone have to look at them
- first and determine that they're suspicious or not?
- 4 MS. DESH: Same objection. Calls for
- 5 speculation.
- A. I can't really recall. I know we were
- 7 just starting to use a new dashboard and automation in
- various processes. I just can't remember.
- 9 Q. (By Mr. Shkolnik) I quess maybe my
- 10 question was kind of vague. Let me try to phrase it
- 11 this way. Was every reduced order automatically
- 12 reported to the DEA?
- MS. DESH: Objection. Calls for
- 14 speculation.
- Q. (By Mr. Shkolnik) When you became a
- 16 member of RX Integrity?
- MS. DESH: Same objection.
- 18 A. To the best of my recollection, I believe
- 19 it was.
- Q. (By Mr. Shkolnik) That was not occurring
- 21 before RX Integrity came into place; correct?
- 22 A. I can't speculate to how -- what they were
- 23 doing before I came into place.
- MR. SHKOLNIK: We can go to the next

- 1 exhibit. That's 68.
- Q. (By Mr. Shkolnik) I'm going to hand you
- 3 Exhibit Number 014. Bates numbers is 00114602.
- 4 [Exhibit Walgreens-Dymon-014
- 5 marked for identification.]
- 6 Q. This is an e-mail that went out to a large
- 7 group on December 7, 2012. Based upon your
- 8 recollection of joining the team, would it be fair to
- 9 say you would not have been on this distribution? I
- 10 know there's a lot of people here.
- 11 A. Correct.
- 12 Q. At this time where were you, in December
- 13 of 2012?
- 14 A. Pharmacy manager still.
- Q. And was the first week of January your
- 16 first -- was when you began working in Integrity?
- 17 A. Yes, about end of first week, start of
- 18 second week of January.
- 19 Q. Did you have to go through an interview
- 20 process to be added to the team?
- 21 A. Yes.
- Q. Were they looking for someone who had
- 23 store-level experience, a Pharm D, to help come onto
- 24 the team?

- 1 A. Yes.
- Q. Had you worked with Tasha Polster before?
- 3 A. Yes.
- 4 Q. In what capacity?
- 5 A. When I was a pharmacy intern I worked with
- 6 her.
- 7 Q. What was her position at the time when you
- 8 worked with her?
- 9 A. She was a pharmacy supervisor.
- 10 Q. When you were saying -- when you did those
- 11 sort of -- I think you said it was ridealong or
- 12 something along -- you used a phrase earlier.
- 13 A. Correct.
- Q. A ridealong --
- 15 A. Internship.
- 16 Q. Were you working with -- was that with
- 17 Tasha in that capacity?
- 18 A. Yes.
- 19 Q. And when this new team was being
- developed, did she reach out to you and say would you
- be interested in coming onboard, or did you submit an
- 22 application? How did this come about?
- A. My field leaders recommended the position,
- that I look into it, and she also said there's an

- 1 opportunity on my team if you'd like to look at it and
- 2 apply.
- Q. Had you stayed in contact with Ms. Polster
- 4 during the years in between?
- 5 A. Not really.
- Q. This is a presentation that occurred on
- 7 January 31st, 2013. You were part of -- you were now
- 8 part of RX Integrity at that point; correct?
- 9 A. Correct.
- 10 Q. Did you attend this meeting with Mr.
- 11 Bleser and the large group of people when it occurred
- in January of 2013?
- 13 A. No.
- Q. Did you work under Mr. Bleser at any point
- 15 in time?
- A. No, I did not.
- MR. SHKOLNIK: If we could jump ahead to
- 18 Bates numbered 4613, please.
- 19 Q. (By Mr. Shkolnik) We have here a slide
- that was included in the presentation. And I believe
- 21 quite a few members of your, I think, RX Integrity team
- were on the distribution, if I'm not mistaken. I think
- 23 Ms. Polster was there, and Mr. Merritello, and Mr.
- 24 Murray, and I believe Barb Martin. They were all on

- 1 this distribution.
- 2 Did anyone ever tell you about this
- quarterly report that was being given when you first
- 4 got onto the team?
- 5 A. Not that I can recall.
- 6 Q. Now, this slide was included in the
- 7 presentation, and it refers to -- and the heading is,
- 8 and it's under a Walgreens PowerPoint background,
- 9 troubling trend in the United States, leading cause of
- 10 death is prescription drugs.
- Were you aware that by 2011 prescription
- 12 drugs was the leading cause of accidental death in the
- 13 United States?
- 14 A. Just aware of what I heard in the media
- 15 around that time.
- 16 Q. Did you hear anything in the company about
- that when you were joining RX Integrity?
- 18 A. Not that I can recall.
- 19 Q. Was anyone talking about the fact that DEA
- and governmental entities were beginning to look at the
- 21 fact that prescription drugs were now passing illegal
- drugs, poisons, and car accidents as a number one cause
- of death in the United States?
- A. Not that I can recall.

- 1 Q. From a pharmacy perspective, that's a
- 2 significant fact, isn't it, to all of a sudden for the
- 3 first time in history prescription drugs are the
- 4 leading cause of death in the United States, surpassing
- 5 things like car accidents and illegal drugs and
- 6 poisonings? Would you agree with that?
- 7 A. It's a health care effect, yes.
- 8 Q. And this was an early sign of an epidemic
- 9 developing in the United States related to prescription
- 10 drugs and death; correct?
- 11 A. To my personal understanding, yes, that
- would be kind of the start of it, yes.
- MR. SHKOLNIK: And if we go to the next
- 14 slide, 614, please.
- 15 Q. (By Mr. Shkolnik) Now, here the teams
- 16 were given an outline, which was the evolution of
- 17 suspicious order monitoring, with a timeline of events.
- 18 And there was testimony by Mr. Bleser that this was
- 19 actually prepared by the Pharmacy Integrity group to be
- included in the quarterly presentation.
- Did anyone ask you for any input into
- 22 the -- into a PowerPoint on the timeline of events
- 23 regarding suspicious order monitoring?
- A. I have may have reviewed or edited, but I

- 1 can't recall.
- Q. You worked with Ms. Polster and actually
- 3 worked with her on some of the PowerPoints that were
- 4 being developed for the team; am I correct?
- 5 A. Correct.
- Q. I noticed, looking at a lot of your files,
- 7 you were pretty prolific in the PowerPoint area. Were
- 8 you -- did she like rely on you in some way to help her
- 9 when she was doing her PowerPoint presentations?
- 10 A. As a reviewer or to assemble graphics and
- 11 stuff, yes.
- 12 Q. So here one of -- the timeline starts with
- 13 pre-August of 2010. Were you aware that there was a
- 14 steady increase in Florida pill mills and prescribers
- 15 dispensing medication? Did you know that that was like
- 16 a problem going on down in Florida?
- 17 A. Not in 2010, no.
- 18 Q. Did you ever become aware that one of the
- 19 problems with respect to the prescription drug deaths
- increase was related to increase in Florida pill mills?
- MS. DESH: Objection to the form.
- A. Not at that time, no.
- MR. SHKOLNIK: Before I go through this
- whole -- it's going to be a while on this. Let's take

- 1 a five-minute; okay?
- THE VIDEOGRAPHER: We're off the record at
- 3 3:39 PM.
- 4 [A brief recess was taken.]
- 5 THE VIDEOGRAPHER: We are back on the
- 6 record at 3:56 PM.
- 7 Q. (By Mr. Shkolnik) Mr. Dymon, the next
- 8 milestone on this timeline is October 2010. It says a
- 9 change in Florida legislation restricts prescriber
- 10 dispensing to only 72-hour supply of pain medication.
- Is that something you became aware of as a
- 12 practicing pharmacist back in those days, that there
- were changes being implemented in Florida related to
- 14 the prescription of pain medications and doctor
- 15 prescriptions?
- 16 A. No, not at that time.
- Q. At a later time did you become aware of
- 18 that?
- 19 A. When I was in Integrity.
- Q. And was this timeline that we're seeing
- 21 here something that was discussed ultimately while you
- were in Integrity, as it relates to Florida?
- 23 A. Various timelines where there may have
- 24 been something around Florida.

- 1 Q. And the next milestone is October 2010 to
- 2 March 2010 (sic). There is a dramatic increase in the
- 3 number of opioid pain medication prescriptions seen at
- 4 retail stores.
- 5 Did you become aware of that first while
- 6 you were still working in the pharmacy setting?
- 7 A. Not that I can recall, no.
- 8 Q. When you got into Pharmaceutical
- 9 Integrity, did you become aware that, as an industry,
- 10 there had been -- that the big chain pharmacy companies
- 11 saw a dramatic increase in opioid pain medication
- 12 prescriptions that were triggered as a result of
- 13 Florida's change in its law regarding dispensing of
- pain medication at doctor's offices or pill mills?
- A. When I entered into RX Integrity, I became
- 16 aware of Florida.
- 17 Q. And you then became aware that there was a
- 18 problem with what was known as pill mills; am I
- 19 correct?
- 20 A. Correct, through the media.
- Q. And there were pill mills here in the
- 22 Chicagoland area, weren't there?
- A. There may have been. I'm not aware.
- Q. Never heard of any pill mills in this

- 1 area?
- 2 A. Not that I can recall.
- Q. Never heard of it being any type of a
- 4 problem that there were pain medication pill mills
- 5 popping up even here in Illinois?
- A. Not that I was aware of.
- 7 Q. Did the Walgreens stores where you were
- 8 working, did they exhibit any increase in opioid sales
- 9 over the years you were there?
- 10 A. Not that I know of.
- 11 Q. So when you were -- when you were a
- 12 floating pharmacist and then you became a manager of
- pharmacies, you yourself did not see any escalation of
- opioid prescriptions over the years, like a trending
- up, between the 2004 time frame and 2011, when you
- 16 stopped -- I'm sorry, 2012, when you stopped?
- 17 A. Not that I can recall.
- 18 Q. Wasn't it a fact in the industry that
- 19 there was a -- in your industry, as a pharmacist,
- wasn't it common knowledge that opioids, the filling of
- opioid prescriptions and the prescription numbers, were
- increasing exponentially over the years from early
- 23 2000s up through 2013 or 2012? Wasn't that just
- 24 well-known in your industry?

- 1 MS. DESH: Objection to the form.
- 2 A. Not to my own personal knowledge or
- 3 recollection at that time, no.
- 4 Q. (By Mr. Shkolnik) You didn't go to any
- 5 continuing pharmacy education programs where that was
- 6 talked about?
- 7 A. Not that I can recall.
- 8 Q. You didn't go to any task force meetings
- 9 in your state where this was discussed or anything like
- 10 that?
- 11 A. No, not that I can recall.
- 12 Q. Were you a member of any organizations
- here in your state for pharmacists?
- A. Not that I -- not at that time that I
- 15 remember, no.
- Q. Did you receive any communications from
- 17 any -- from the pharmacy boards of the state of
- 18 Illinois talking about increasing prescriptions of
- opioids over the last decade, 2000 to 2010, 2012?
- 20 Anything from them?
- 21 A. No, not that I recall.
- Q. Are you still a licensed pharmacist here
- in the state of Illinois?
- 24 A. Yes, I am.

- 1 Q. Have you always remained a licensed
- 2 pharmacist from the time you first got your license?
- 3 A. Yes.
- 4 Q. Do you receive communications from the
- 5 pharmacy board from your state periodically?
- A. Occasionally, yes.
- 7 Q. Did -- as you sit here today, is it your
- 8 testimony you've received no communications from the
- 9 pharmacy board of Illinois related to opioid
- 10 prescription and habits of prescriptions?
- 11 A. To my recollection, I do not recall
- 12 receiving any communications around that.
- Q. Does the pharmacy board sometimes issue
- 14 periodic publications to its members?
- 15 A. I do not know if they issue publications.
- 16 They may on their website. I don't go to it or I'm not
- a board member or anything like that with the board.
- 18 Q. No, I'm just saying as a member do you get
- 19 communications from the pharmacy board?
- A. I may get one e-mail a year about license
- 21 renewals. That's about it.
- Q. Are you a member of any societies of
- 23 pharmacies or any other type of organizations for
- 24 pharmacists?

- 1 A. No, not at this time.
- Q. How about prior to 2012?
- 3 A. I may have been a part of the Illinois
- 4 Pharmacists Association at one point, was a member for
- 5 a short time, but it may have been around 2014, 2015.
- 6 I don't remember.
- 7 Q. During that time did you receive
- 8 communications from the Illinois Pharmacists
- 9 Association related to increasing opioid prescriptions?
- 10 A. Not that I can recall.
- 11 Q. So in October 2010 to March of 2011 you
- 12 did become aware that the pharmacies -- the retail
- 13 pharmacies were seeing dramatic increases of opioid
- 14 pain medications in the state of Florida? That's
- something you did become aware of?
- 16 A. Not at that time, no.
- 17 Q. But later?
- 18 A. Yes.
- 19 Q. And then you also became -- later then,
- July 2011, Florida prohibited practitioners from
- 21 dispensing C-II and C-IIIs except very limited
- 22 transactions or instances. You became aware of that
- 23 ultimately?
- A. Correct.

- 1 Q. And when you were in the Pharmacy
- 2 Integrity unit, did this issue come up in terms of
- 3 explaining the history of why the DEA was taking action
- 4 against Walgreens as well as other pharmacies and
- 5 distributors in the United States?
- A. Yes, in general.
- 7 Q. And then the next page talks about the
- 8 2012 timeline going into 2013. And it says there was
- 9 administrative inspection warrants in the six stores
- 10 and Jupiter distribution center. We talked about that
- 11 earlier, you did become aware of that; correct?
- 12 A. Correct.
- Q. And then May to June of 2012, eight stores
- 14 voluntarily removed all C-II products, Xanax and Soma,
- and in that time period the relaunch of good faith
- 16 dispensing policy.
- Does that refresh your recollection as to
- when the GFD was relaunched in Walgreens?
- 19 A. Potentially when I was in the field at
- 20 that time, probably, yes.
- Q. Did you go through the training at that
- point in time, the GFD training?
- 23 A. If it was launched to everyone at the
- stores, I would have. I just can't recall or remember

- 1 how it was done.
- Q. If you had gone through the GFD training
- 3 module that was released to all the pharmacists and
- 4 stores, would that have been something that you would
- 5 have done online through like their WalNet or some
- 6 other pharmacy -- Walgreens interface?
- 7 A. Yes.
- 8 Q. Is that something that would have been
- 9 kept in your personnel file to show that you actually
- 10 completed good faith dispensing training?
- 11 A. Potentially either at store level, or I
- don't know if it's stored in a database or something
- 13 along those lines. I'm not sure.
- Q. As you sit here today, do you recall if
- 15 you completed any relaunched good faith dispensing
- 16 policy training program?
- 17 A. I may have. I just can't recall that far
- 18 back.
- 19 Q. Then it says September 2012 an ISO was
- 20 issued for Jupiter distribution center, and in November
- 21 an order to show cause was issued for the three Florida
- 22 pharmacies.
- Were you aware of that when this was
- 24 occurring? Did you hear about that through the

- 1 Walgreens network or through other channels?
- 2 A. No.
- Q. Was there word being released by the
- 4 company to all the stores, we're having a problem with
- our Florida stores and our distribution center, we want
- 6 you to be aware of it, we want you to be more in tuned
- 7 into your prescription processing with respect to
- 8 controlled substances -- anything like that?
- 9 MS. DESH: Objection to the form.
- 10 A. Not that I can recall.
- 11 Q. (By Mr. Shkolnik) Did you have any
- understanding as to why the company was relaunching a
- 13 good faith dispensing policy right around the time when
- 14 they had just been served with inspections and warrants
- 15 in Florida?
- 16 A. I can't recall why they were launched.
- 17 They might have evolved the policy over time.
- 18 Q. So after you joined -- after you joined
- 19 Pharmaceutical Integrity, did you reach a conclusion
- that the relaunch of good faith dispensing was
- 21 unrelated to DEA action, that this was just Walgreens
- looking to be a good pharmacy? Is that your
- 23 understanding?
- A. My understanding is the policy evolved

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Case: 1:17-md-02804-DAP Doc.#: 1976-21 Filed: 07/24/19 321 of 343 PageID.#: 221689 Highly Confidential: - Subject to Further Confidentiality Review
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Case: 1:17-md-02804-DAP Doc.#: 1976-21 Filed: 07/24/19 323 of 343 PageID.#: 221691 Highly Confidential Exercises
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